

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

In Re: ) Chapter 7 Case No. 12-18840  
 )  
Dehra Battle ) Bankruptcy Judge Jessica Price Smith  
 )  
Debtor )

**AMENDED MOTION FOR TURNOVER OF PROPERTY OF THE ESTATE**

Now comes Sheldon Stein, the Chapter 7 Trustee herein, and respectfully represents to the court as follows:

1. The debtors filed a petition under Chapter 7 of Title 11, U.S.C. on September 29, 2011 (“Petition Date”). The movant is the appointed Chapter 7 Trustee in the debtors’ case.
2. According to testimony at the §341 meeting of creditors and Amended Schedule B, the debtor owned, on the petition date, a 2007 Ford Edge, vin no. 2FMDK49C87BB18432.
3. According to the NADA Office Used Car Guide, the vehicle has an average trade-in value of \$12,600.00, and an average auction value of \$13,049, Kelly Blue Book says that the average private party sale value of this vehicle is \$14,947.00 and also says that the average trade-in value is \$21,437.00. The debtor has claimed exemptions on Amended Schedule C of \$4,600.00.
4. In accordance with 11 U.S.C. §541 the equity in this vehicle is property of the estate and subject to turnover to the movant.
5. Therefore, the movant respectfully moves the court, pursuant to 11 U.S.C. §542(a), for an order requiring the debtor to immediately turnover to the movant the vehicle described in

paragraph 2, above, and for such other relief as the court deems just.

WHEREFORE, the movant respectfully moves the court, pursuant to 11 U.S.C. §542(a), for an order requiring the debtor to immediately turnover to the movant the vehicle described in paragraph 2, above, and for such other relief as the court deems just.

/s/ Sheldon Stein  
Sheldon Stein, Trustee (0007292)  
50 Public Square, Ste. 400  
P.O. Box 5606  
Cleveland, OH 44101  
(216) 696-7449  
(216) 696-5329 (fax)  
[sstein@epiqtrustee.com](mailto:sstein@epiqtrustee.com)

Certificate of Service

I certify that on April 11, 2013, a true and exact copy of this document was served:

Via the Courts Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

- Faye Dian English                      bknotice@reimerlaw.com, RACJ.ecfndoh@yahoo.com
- Sheldon Stein                            sstein@epiqtrustee.com, sstein@ecf.epiqsystems.com
- Sam Thomas                            sam@st3attorney.com,

A hearing is scheduled on the foregoing motion in courtroom 2B of the United States Bankruptcy Court, H. M. Metzenbaum U.S. Court House, 201 Superior Avenue, Cleveland, Ohio 44114, on May 7, 2013, at 9:30 a.m. to consider any written opposition to this matter which is filed and served no later than seven calendar days preceding the date scheduled for such hearing. If no opposition to this matter is filed and served within such time, the motion may be granted without a hearing.

/s/ Sheldon Stein  
Sheldon Stein, Trustee

**NADA Official Used Car Guide**

Thursday, April 11, 2013

**Vehicle Summary NADA Auction Value**

<b>Period:</b>	<b>Data Period: 4/8/2013 - 4/14/2013</b>	<b>Reference #:</b>	
<b>Region:</b>	<b>Central</b>	<b>VIN:</b>	<b>2FMDK49C87BB18432</b>
<b>Vehicle Description:</b>	<b>2007 FORD TRUCK Edge-V6 Wagon 4D SEL Plus AWD</b>		
<b>Mileage:</b>	<b>82,500</b>		

	<b><u>Low Auction Value</u></b>	<b><u>Average Auction Value</u></b>	<b><u>High Auction Value</u></b>
<b>NADA Adjusted Value*:</b>	<b>\$10,574</b>	<b>\$13,049</b>	<b>\$15,549</b>

**Options:**

\*Auction values displayed include typical equipment and adjustments for mileage and any of the following applicable accessories: engine size, drivetrain, and trim.

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**NADA Official Used Car Guide**

Thursday, April 11, 2013

**Vehicle Summary NADA Values**

**Region:** Central - April 2013      **Reference #:**  
**Vehicle Description:** 2007 FORD TRUCK      **VIN:** 2FMDK49C87BB18432  
                                  Edge-V6  
                                  Wagon 4D SEL Plus AWD  
**MSRP:** \$30,720      **Weight:** 0  
**Mileage:** 82,500



	<u>Rough</u> <u>Trade-In</u>	<u>Average</u> <u>Trade-In</u>	<u>Clean</u> <u>Trade-In</u>	<u>Clean</u> <u>Loan</u>	<u>Clean</u> <u>Retail</u>
<b>Base Value</b>	\$11,400	\$12,650	\$13,650	\$12,300	\$16,625
<b>Optional Equipment</b>					
<b>Option Total</b>	\$0	\$0	\$0	\$0	\$0
<b>Mileage Adjustment</b>	\$0	\$0	\$0	\$0	\$0
<hr/>					
<b>Total NADA Official Used Car Guide Values</b>	\$11,400	\$12,650	\$13,650	\$12,300	\$16,625

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### Your Blue Book<sup>®</sup> Value



## 2007 Ford Edge

Style: SEL Plus Sport Utility 4D  
Mileage: 82500

### Private Party Value

Excellent  
**\$15,847**

Very Good  
**\$15,347**

Good  
**\$14,947**

Fair  
**\$13,447**

### Vehicle Highlights

MPG: City 16/Hwy 22

Max Seating: 5

Doors: 4

Engine: V6, 3.5 Liter

Drivetrain: AWD

Transmission: Automatic

EPA Class: Sport Utility Vehicles

Body Style: Sport Utility

Country of Origin: United States

Country of Assembly: United States

### Your Configured Options

Our pre-selected options, based on typical equipment for this car.

✓ Options that you added while configuring this car.

#### Engine

V6, 3.5 Liter

#### Transmission

Automatic

#### Drivetrain

✓ AWD

#### Braking and Traction

Traction Control

Stability Control

ABS (4-Wheel)

#### Comfort and Convenience

Air Conditioning

Power Windows

Power Door Locks

Cruise Control

#### Steering

Power Steering

Tilt Wheel

#### Entertainment and Instrumentation

AM/FM Stereo

#### Safety and Security

Dual Air Bags

Side Air Bags

#### Seats

Power Seat

Leather

#### Wheels and Tires

Alloy Wheels

### New Cars You Might Like



2013 Ford Edge



2013 Jeep Grand Cherokee



2013 Kia Sorento



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## Your Blue Book® Value



## 2007 Ford Edge

Style: SEL Plus Sport Utility 4D  
Mileage: 82500

### Trade-In Value

Excellent  
**\$13,287**

Very Good  
**\$12,987**

Good  
**\$12,437**

Fair  
**\$10,962**

### Vehicle Highlights

MPG: City 16/Hwy 22

Doors: 4

Drivetrain: AWD

EPA Class: Sport Utility Vehicles

Country of Origin: United States

Max Seating: 5

Engine: V6, 3.5 Liter

Transmission: Automatic

Body Style: Sport Utility

Country of Assembly: United States

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✓ Options that you added while configuring this car.

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#### Drivetrain

✓ AWD

#### Braking and Traction

Traction Control

Stability Control

ABS (4-Wheel)

#### Comfort and Convenience

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Side Air Bags

#### Seats

Power Seat

Leather

#### Wheels and Tires

Alloy Wheels

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